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January 12, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Assessment and Collection of Regulatory Fees for FY 2017, MD Docket No. 17-134

Dear Ms. Dortch

On January 10, 2018, I met with Thomas Buckley and Roland Helvajian of the Office of the Managing Director, Mika Savir of the Enforcement Bureau, and David Krech, Kimberly Cook, and Veronica Garcia-Ullea of the International Bureau to discuss the Commission's proposals to revise the regulatory fee methodology for satellite and terrestrial IBCs.¹

Consistent with CenturyLink's advocacy in this proceeding, I argued that the number of satellite or terrestrial IBCs a provider has in service has no particular impact on the benefits that provider receives from the Commission's activities or on the Commission's costs. A two-tier system is therefore sufficient to ensure that the satellite and terrestrial IBC regulatory fees do not serve as a barrier to entry for smaller providers while ensuring that larger providers pay a fair and equitable portion of the fee category.

I further noted that it will be difficult for any carrier to identify appropriate breakpoints for a multi-tier system because carriers are only able to view their own data. Finally, I noted that it will be difficult for the Commission to identify appropriate break points for FY 2018 given that this will be the first year that carriers file both common carrier and non-common carrier circuits.

Sincerely,

/s/ Nicholas G. Alexander
Nicholas G. Alexander

Cc: Thomas Buckley
Roland Helvajian
Mika Savir
David Krech
Kimberly Cook
Veronica Garcia-Ullea

¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2017*, MD Docket No. 17-134, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 7057, 7075, paras. 47-48 (2017).